

# Exhibit F\_ Defendant- Opposer's Initial Disclosures

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

DONALD J. TRUMP,

Opposer,

-against-

TRUMP YOUR COMPETITION,

Applicant.

Opposition No. 91217618

**OPPOSER'S INITIAL DISCLOSURES**

Pursuant to Trademark Rule of Practice 2.120 and Federal Rule of Civil Procedure 26(a)(1)(A) as applicable, Opposer, Donald J. Trump ("Opposer"), for his Initial Disclosures states as follows:

**A. Individuals believed likely to have discoverable information to support Opposer's claims:**

Alan Garten, Esq., Executive Vice President and General Counsel, The Trump Organization, which is Opposer's authorized designee for the use and licensing of the TRUMP trademarks. Subjects of information: General business of Opposer; Opposer's ownership of the TRUMP mark; Opposer's business practices involving the TRUMP mark; reputation and perception of the TRUMP mark; and the injury or potential injury to Opposer posed by Applicant's mark.

**B. Documents believed to be in Opposer's possession, custody or control that he may use to support his claims or defenses:**

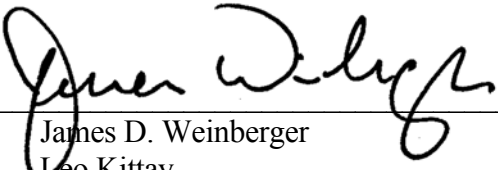
Categories of documents listed below will be located at Opposer's headquarters or at the offices of his counsel, Fross Zelnick Lehrman & Zissu, P.C., 866 United Nations Plaza, New York, NY 10017:

- Documents sufficient to evidence Opposer's surname;
- Documents sufficient to evidence Opposer's ownership of the TRUMP mark;
- Documents sufficient to evidence Opposer's registration of the TRUMP mark;
- Documents sufficient to evidence Opposer's business practices involving the TRUMP mark;
- Documents sufficient to evidence the strength of Opposer's TRUMP mark;
- Documents sufficient to evidence Opposer's use of the TRUMP mark, including on products and publications, in advertisements and in marketing materials;
- Documents sufficient to evidence channels of trade of products bearing the TRUMP mark; and
- Documents sufficient to evidence revenue generated in connection with the TRUMP mark.

Opposer has not concluded its investigation of the facts relating to this proceeding and has not completed formal discovery or preparation for trial. Accordingly, documents or information may exist of which Opposer does not yet have knowledge or has not yet located, identified or reviewed. All of the foregoing disclosures are therefore based on such information currently known or available to Opposer after a reasonable inquiry pursuant to Federal Rule of Civil Procedure 26(a)(1)(E). Opposer reserves the right to alter, amend or supplement its disclosures herein pursuant to Federal Rule of Civil Procedure 26(e) as made applicable to this proceeding pursuant to the Trademark Rules of Practice 2.116.

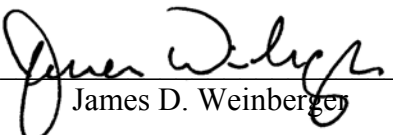
Dated: January 20, 2015  
New York, New York

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

By:   
James D. Weinberger  
Leo Kittay  
866 United Nations Plaza  
New York, New York 10017  
(212) 813-5900

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing **OPPOSER'S INITIAL DISCLOSURES** was sent by First Class mail, postage pre-paid, to Applicant at the address of its Correspondent of Record, Rod Underhill, PO Box 1238, Julian, CA 92036-1238, this 20th day of January, 2015.

  
James D. Weinberger

